

Beth E. Levine, Esq.
Andrew W. Caine, Esq. (admitted *pro hac vice*)
Jason S. Pomerantz, Esq. (admitted *pro hac vice*)
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777
Email: blevine@pszjlaw.com
acaine@pszjlaw.com
jspomerantz@pszjlaw.com

Counsel to Plaintiff Runway Liquidation, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RUNWAY LIQUIDATION HOLDINGS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 17-10466 (SCC)

(Jointly Administered)

RUNWAY LIQUIDATION, LLC,

Plaintiff,

Adv. Proc. No. 19-01034 (SCC)

v.

BOLTON CONSTRUCTION LIMITED LIABILITY
COMPANY,

Defendant.

STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

¹ A list of the Post-Effective Date Debtors in these chapter 11 cases, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number include: Runway Liquidation Holdings, LLC (6857); Runway Liquidation, LLC (5942); Runway Liquidation Intermediate Holdings, LLC (3673); MR Liquidation, LLC (9200); and MMH Liquidation, LLC (3854).

Plaintiff, Runway Liquidation, LLC ("Plaintiff") and defendant, Bolton Construction Limited Liability Company ("Defendant"), by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on February 26, 2019, Plaintiff filed a complaint (the "Complaint") against Defendant;

WHEREAS, the summons (the "Summons") was issued on February 27, 2019; and

WHEREAS, on March 8, 2019, Defendant was served with the Summons and Complaint;

The parties hereby stipulate and agree to the matters set forth below:

1. The time by which Defendant is required to answer the Complaint is extended through and including April 29, 2019.
2. Defendant does not challenge personal jurisdiction and waives any objection to service of process of the summons and complaint in this adversary proceeding.

Dated: March 27, 2019

PACHULSKI STANG ZIEHL & JONES LLP
Counsel to Plaintiff, Runway Liquidation, LLC

By: /s/ Beth E. Levine

Beth E. Levine, Esq.
Andrew W. Caine, Esq. (admitted
pro hac vice)
Jason S. Pomerantz, Esq. (admitted
pro hac vice)
780 Third Avenue, 34th Floor
New York, NY 10017
Tel.: (212) 561-7700
Fax: (212) 561-7777
Email: blevine@pszjlaw.com
acaine@pszjlaw.com
jspomerantz@pszjlaw.com

Dated: March 27, 2019

MANDELBAUM SALSBERG P.C.
Counsel for Bolton Construction Limited Liability Company

By: 

Jeffrey M. Rosenthal, Esq.
3 Becker Farm Road, Suite 105
Roseland, NJ 07068
Tel: (973) 396-8378
Fax: (973) 325-7467
JRosenthal@lawfirm.ms